

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

LINDSAY DORAY,  
Plaintiff

VS.

CA. NO. 20-40124

**TOWN OF EAST BROOKFIELD and  
BOARD OF SELECTMEN OF THE  
TOWN OF EAST BROOKFIELD  
Defendants**

**DEFENDANTS TOWN OF EAST BROOKFIELD AND BOARD OF  
SELECTMEN OF THE TOWN OF EAST BROOKFIELD'S NOTICE OF REMOVAL**

NOW COME the defendants Town of East Brookfield and the Board of Selectmen of the Town of East Brookfield (herein “defendants”) in the above-entitled cause, and respectfully show to the Court:

1. The above action has been brought in the Worcester Superior Court and is now pending therein. Said action was commenced on September 16, 2020 the defendants were served on September 16, 2020 and the time for filing of this notice has not expired.
2. Said action involves a controversy of federal question, namely, alleged violations of the Fair Labor Standards Act under 29 U.S.C. § 207(a).
3. The nature of the controversy between the plaintiff, Lindsay Doray and said petitioners is as follows: the plaintiff alleges that the Town of East Brookfield failed to pay the plaintiff minimum wages in her roles as Assistant Animal Control officer, Animal Control officer and Inspector of Barns and Animals.
4. The matter in controversy between the plaintiff and defendants involves a federal question.

WHEREFORE the petitioners pray that this cause be removed from said state court to this Honorable Court as provided by law.

DEFENDANTS,  
BY THEIR ATTORNEY,

/s/ Courtney E. Mayo

Courtney E. Mayo, Esquire

BBO # 657790

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October 7, 2020

**CERTIFICATE OF SERVICE**

I, Courtney E. Mayo, counsel of record for the defendants Town of East Brookfield and the East Brookfield Board of Selectmen in this action, do hereby certify that I have served a copy of the foregoing Notice of Removal, to all parties, through the ECF system this 7<sup>th</sup> day of October 2020 to:

Benjamin C. Rudolf, Esquire  
Murphy & Rudolf, LLP  
One Mercantile Street, Suite 740  
Worcester, MA 01608  
[brudolf@murphyrudolf.com](mailto:brudolf@murphyrudolf.com)

/s/ Courtney E. Mayo  
Courtney E. Mayo, Esquire